

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
 )  
Advanced Television Systems and ) MM Docket 87-268  
Their Impact upon the Existing )  
Television Broadcast Service )

To: The Commission

REPLY COMMENTS OF THE  
LAND MOBILE COMMUNICATIONS COUNCIL

The Land Mobile Communications Council ("LMCC") hereby submits the following Reply to comments filed in response to the Commission's Second Notice of Proposed Rulemaking in the above-captioned proceeding.

The Second Notice includes a proposed all-UHF table of allotments for Advanced Television ("ATV") stations. LMCC's initial comments, as well as those of other land mobile interests,<sup>1/</sup> discussed the impact of the proposed ATV allotments on existing land mobile operations on UHF Channels 14-20 (470-512 MHz) and in frequency bands immediately adjacent to UHF Channels 14 and 69. LMCC did not object to the proposed new standard mileage separations for ATV/land mobile interference protection. However, LMCC and others strongly opposed ATV allotments that would be short-spaced to adjacent channel and co-channel land mobile facilities, many of which are used for critical public safety communications.

<sup>1/</sup>See Comments of APCO, Comments of the County of Los Angeles, and Comments of the New York Public Safety Agencies.

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Most of the broadcasters filing comments strongly opposed various aspects of the Commission's proposed ATV allotments. However, only a few of the initial comments filed by broadcasters addressed the issue of land mobile sharing of the UHF band. The Joint Broadcaster Comments made a bald statement that "the proposed ATV-to-land mobile interference protection standards are ill-advised and unnecessarily protective of land mobile operations," but failed to provide any technical support for that position. As explained in detail in LMCC's initial comments and Appendices A and B thereto, the proposed standards are appropriate and necessary to prevent destructive interference to vital land mobile radio operations.

A few UHF broadcasters made the extraordinary suggestion that land mobile licensees should be forced to abandon their operations on UHF Channels 14-20 and relocate to the VHF spectrum eventually vacated by broadcasters moving to the UHF band.<sup>2/</sup> Aside from being far beyond the scope of this proceeding, this suggestion ignores the massive costs and disruption to vital communications services of such a relocation. Many of the largest land mobile users of the UHF band are state and local governments who use their facilities for critical public safety communications. They and other land mobile users of the band would have to completely rebuild their communications

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<sup>2/</sup>Comments of KSCI, Inc., Comments of Golden Orange Broadcasting Co., Inc.

systems if forced to move to the VHF band, at a total cost well in excess of one billion dollars.<sup>2/</sup>

WTLK-TV, the licensee of Channel 14 in Rome-Atlanta, Georgia, suggests that the upper 4 MHz of UHF Channel 69 and the lower 4 MHz of Channel 14 (for a total of 8 MHz) should be reallocated to land mobile services (which currently occupies the adjacent channels). This additional spectrum allocation would be beneficial to land mobile users. However, WTLK-TV's further suggestion that existing land mobile users in the UHF TV band (i.e., in Channels 14-20) vacate their frequencies and move into the newly created land mobile assignments is unworkable. Aside from the cost and disruption of such a move, the 8 MHz of spectrum created would be insufficient to accommodate current land mobile users of Channels 14-20. Indeed, UHF Channel 14 is already authorized for land mobile operations in most of the markets in which land mobile sharing is permitted (including the highly congested New York and Los Angeles areas), further reducing the amount of "new" spectrum that would become available under WTLK-TV's proposal.

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<sup>2/</sup> Just one licensee, the County of Los Angeles, has over \$60 million dollars invested in its UHF land mobile radio system, which provides all basic voice and data communications for the Los Angeles County Sheriff's Department.

**CONCLUSION**

Therefore, for the reasons discussed above and in its initial Comments, LMCC urges the Commission to reject any ATV allotment plan that would cause interference with or otherwise disrupt current land mobile radio operations.

Respectfully submitted,

LAND MOBILE COMMUNICATIONS  
COUNCIL

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